

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

**DAWN DORLAND PERRY’S MOTION FOR RECONSIDERATION OF DECISION ON
MOTION TO AMEND RESTATED COUNTERCLAIM**

Dawn Dorland Perry (“Ms. Dorland”) respectfully moves this Court to reconsider its Order [Dkt. No. 161] denying Ms. Dorland’s Motion to Amend her Restated Counterclaim (“Motion to Amend”). The Order made clear that the basis for the Court’s denial of Ms. Dorland’s Motion to Amend was timing: the Motion was filed and served after the August 31, 2020 deadline to amend pleadings in this matter, and fact discovery is already closed. However, delay standing alone should not prevent a full adjudication on otherwise meritorious claims, particularly where the facts giving rise to the proposed new claim were not disclosed until after

the pleading deadline, especially absent prejudice to the other party. Accordingly, Ms. Dorland respectfully requests that the Court reconsider its denial of her Motion to Amend.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I, Suzanne M. Elovecky, do hereby certify that, pursuant to Local Rule 7.1(a)(2), I have conferred with counsel for the Plaintiff in an attempt to resolve or narrow the issues raised by the foregoing motion and have been unsuccessful. Said conference took place by telephone at 3:00 PM on February 7, 2022. While counsel for Jeffrey Cohen and Cohen Business Law Group stated in advance of said conference that he holds no position concerning the relief sought, counsel for Ms. Larson intends to oppose the present motion.

Respectfully submitted,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne M. Elovecky

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 7, 2022.

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky (BBO #670047)